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MEMO ENDORSED

August 10, 2020

VIA ECF

Hon. Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Gabriel Letizia Jr.,
19-CR-548 (KMK)

Dear Judge Karas:

I represent the defendant in the above entitled case. I am writing to request an extension of time in the previously scheduled dates of the filing of pre-trial motions. At present the schedule is as follows: Defendant's brief due September 1; government opposition brief due October 1; defendant reply brief due October 15. I respectfully request a two-week extension with respect to all these dates. Assistant US Attorney Jeffrey Coffman has advised me that he has no objection to this request.

I have been working remotely at home because of the coronavirus situation. I have had extreme difficulty working in the last week because of a power outage at my home in Larchmont, NY as a result of the storm last week. The power outage continues, and power is not expected to be back on in my home until tomorrow evening. The motion I will be filing is a suppression motion based on unlawful search and seizure. There are many issues and it is a time-consuming effort. Additionally, I have been quite busy on some other matters.

There has been no previous request for an extension of time to file motions.

Accordingly, I respectfully request that Your Honor extend the filing dates for the pretrial motions as requested above.

Very truly yours,

S/S

Frederick P. Hafetz

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cc: All counsel (via ECF)

Granted. Defense motions are due 9/15/20 and the rest of the briefing schedule is moved back 2 weeks. Time is excluded until 9/15/20 to give Mr. Hafetz adequate time to complete the motions in light of both the coronavirus pandemic and the recent storm, which cut off power to Mr. Hafetz. The interests of justice from this exclusion outweigh Defendant's and the public's interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.



8/10/20